

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:**

<b>Kenneth Imes and Michelle Imes</b>	<b>:</b>	<b>Chapter 7</b>
	<b>:</b>	
<b>Debtors</b>	<b>:</b>	<b>Case No.: 24-14566</b>

**MOTION TO WITHDRAW CHAPTER 7 CASE**

**COMES NOW**, Joseph T Bambrick Jr. counsel for the Debtors, Kenneth and Michelle Imes, who hereby files this Motion to Withdraw says the following:

1. The Debtor are Kenneth and Michelle Imes who files this motion to withdraw their chapter 7 case.
2. An issue has arisen concerning whether or not the debtors are able to retain their home as a result of the bankruptcy file.
3. As a result of the lack of protection for the debtor, as a result of not being protected by the automatic stay and the trustee action in attempting to cease the debtors' home , the debtors wishes to withdraw from the instant bankruptcy action and will accept the responsibility to have to deal with the creditors.

**WHEREFORE**, for all the above reasons, counsel respectfully prays this Honorable Court to:

- a) File to withdraw their bankruptcy petition and to terminate their case; and
- b) Grant such other relief as this court deems fitting and just.

**Respectfully submitted by,**

**Dated:** February 4, 2025

/s/Joseph Bambrick

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